

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Tracie M. Chapman)	Case No. 19-10499
)	Chapter 13 Proceedings
Debtor.)	Judge Jessica E. Price Smith

**TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO VACATE
DISMISSAL AND REINSTATE CHAPTER 13 BANKRUPTCY**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Vacate Dismissal and Reinstate Chapter 13 Bankruptcy (the "Motion") for the following reasons:

Funds do not appear to be on hand to cure payment defaults. **The Debtor is delinquent in the amount of one hundred sixty-six and 53/100 dollars (\$166.53) through August 2019, based on the monthly Chapter 13 plan payment of one hundred sixty-five and 00/100 dollars (\$165.00). In addition, Debtor has another plan payment of \$165.00 due September 30, 2019.**

If the case is reinstated, a new confirmation hearing must be convened.

WHEREFORE, your Trustee, being a proper party in interest, moves this Honorable Court for an order sustaining his objection, and denying the Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala

HOLLY DAVALA (#0070447)
Staff Attorney for Chapter 13 Trustee
200 Public Square, Suite 3860
Cleveland OH 44114-2321
(216) 621-4268 Phone
(216) 621-4806 Fax
Ch13trustee@ch13cleve.com

CERTIFICATE OF SERVICE

I certify that on September 17, 2019, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, Attorney, on behalf of Debtor at rhlegal@aol.com

/S/ Holly Davala

HOLLY DAVALA (#0070447)

Staff Attorney for Chapter 13 Trustee

200 Public Square, Suite 3860

Cleveland OH 44114-2321

(216) 621-4268 Phone

(216) 621-4806 Fax

Ch13trustee@ch13cleve.com

HD/alh

9/17/19